

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: Gregory A Robinson, Sr. and
Valerie D. Robinson

Chapter 13 Case # 09-19117-JNF

Debtor(s)

**Expedited Motion of the Debtors for Authorization to
Enter into a First Mortgage Loan Modification with the Bank of America**

1. The Debtors filed this Chapter 13 Bankruptcy proceeding on September 25, 2009.
2. Examination of the Debtors pursuant to 11 U.S.C. §341 was conducted by the Chapter 13 Trustee on November 4, 2009.
3. The Third Amended Chapter 13 Plan submitted by the Debtors on January 25, 2010 has not yet been confirmed by the court.
4. For an extended period of time, the Debtors have been negotiating with the Bank of America to reduce the payments currently due on the first mortgage loan on their residential real estate located at 90 York Street in Canton, Massachusetts.
5. The Debtors have attached hereto as Exhibit A the pertinent parts of the recently received proposed Loan Modification outlining the following changes:
 - a. Initial interest rate change from 6.375 to 3.250.

- b. The unpaid principal balance expanded from \$463,407.36 to \$482,857.14.
- c. The increase in principal balance occurs by adding to the present principal balance accumulated interest of \$14,716.58 and an escrow delinquency of \$4,733.20.
- d. Maturity date extended to January 1, 2034.

6. The Debtors are extremely desirous of restructuring and modifying the current first mortgage loan to the Bank of America in an effort to remain in their home with their minor children.

7. The Debtors will file a Second Amended Schedule J and Fourth Amended Chapter 13 Plan reflecting the changes if the modification is approved by the court.

WHEREFORE, the Debtors pray this Honorable Court to allow them to enter into the proposed Loan Modification with the Bank of America concerning the first mortgage loan on their residential real estate located at 90 York Street, Canton, Massachusetts 02021.

June 15, 2010

Respectfully submitted by
Counsel for the Debtor

/s/ Joseph P. Foley
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Certificate of Service

I, Joseph P. Foley, counsel for the Debtors hereby certify that on June 15, 2010, I did send by first class prepaid postage, a copy of **Expedited Motion of the Debtors for Authorization to Enter into a First Mortgage Loan Modification with the Bank of America** on the Chapter 13 Trustee, Carolyn A. Bankowski, 13trustee@ch13boston.com, Julie A. Ranieri, Korde & Associates, jranieri@kordeassoc.com and Thomas C. Tretter, Esq., Ablitt Scofield, P.C., ttretter@acdlaw.com.

June 15, 2010

Respectfully submitted by
Counsel for the Debtors

/s/ Joseph P. Foley
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